

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION**

**MDL No. 2738 (FLW) (LHG)**

This document relates to: **Mary A. Renew**

Member Case No. 3:20-cv-5910

**MOTION TO SUBSTITUTE PARTY-PLAINTIFF**

Pursuant to Fed. R. Civ. P. 25(a)(1), the undersigned counsel respectfully moves this Court for an Order substituting Jennifer Greene, the new court-appointed Personal Representative of the Estate of Mary A. Renew, as the Party-Plaintiff on behalf of Ms. Renew's Estate. Movant shows unto the Court as follows:

1. Plaintiff Rebecca Keller, the original personal representative of the Estate of Mary A. Renew, initiated this products liability action in the District of New Jersey on May 14, 2020, prior to Ms. Keller's death.
2. Rebecca Keller passed away on September 25, 2021. A redacted copy of Ms. Keller's Certificate of Death is attached hereto as ***Exhibit A***.
3. A Notice of Suggestion of Death was previously filed in this matter on November 24, 2021 (*see* MDL 2738 Docket No. 26542, also attached hereto as ***Exhibit B***).
4. On November 8, 2021, Ms. Keller's daughter, Jennifer Greene, was duly appointed by the Circuit Court for Hillsborough County, Florida as the new Personal Representative

of the Estate of Mary A. Renew. A copy of the Letters of Administration is attached hereto as *Exhibit C*.

5. The claims submitted in this matter on behalf of Mary A. Renew's Estate survive Rebecca Keller's death, and the successor personal representative, Jennifer Greene, is entitled to continue Decedent Mary A. Renew's causes of action for the benefit of the beneficiaries of the Estate. Federal Rule of Civil Procedure 25(a)(1) states that if a party dies and the claim is not extinguished due to the death, the Court may order the substitution of parties.
6. Personal Representative Jennifer Greene is the Proper Party-Plaintiff and wishes to be substituted on behalf of Decedent Rebecca Keller in this case.
7. WHEREFORE, Jennifer Greene, the new Personal Representative of the Estate of Mary A. Renew, hereby respectfully requests that this Court enter an Order substituting her as the Party-Plaintiff in this Action on behalf of Mary A. Renew's Estate. A proposed Order is attached hereto as *Exhibit D*.

Dated: November 24, 2021

Respectfully Submitted by:

/s/ Wes S. Larsen

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**Counsel for Plaintiff**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2021, a copy of the foregoing **MOTION TO SUBSTITUTE PARTY-PLAINTIFF** was served electronically and notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter. Parties may access this filing through the Court's system.

/s/ Wes S. Larsen  
Wes S. Larsen, Attorney